

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND VIRGINIA**

ROBERT DAVID STEELE,

Plaintiff,

-against-

JASON GOODMAN,

Defendant.


**17-CV-00601-MHL**

**AMENDED MOTION TO  
INTERVENE BY INTERVENOR-  
APPLICANT SWEIGERT**

**AMENDED MOTION TO INTERVENE BY INTERVENOR-APPLICANT SWEIGERT**

1. D. GEORGE SWEIGERT is seeking the LEAVE OF THE COURT TO INTERVENE as a PLAINTIFF into this instant lawsuit pursuant to Fed. R. Civ. Proc. Rule 24(a) and Virginia Supreme Court Rule 3:14. This instant pleading amends and supplements a prior pleading (ECF.no.88) pursuant to Fed. R. Civ. Proc. Rule 15(a) and the Court's Memorandum and Opinion and ORDERS (ECF.nos.85, 86 and 90 respectively).
2. **GHOST WRITING CERTIFICATION. I (the undersigned) declare under penalty of perjury that: NO ATTORNEY HAS PREPARED, OR ASSISTED IN THE PREPARATION OF THIS DOCUMENT.**

Respectfully submitted  April, 2019.

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### **PRELIMINARY STATEMENT**

1. The intervenor-applicant (undersigned) has remained targeted in the social media sights of the Defendant (Def) for almost two (2) years. The Def has conducted and is conducting an unrelenting social media smear campaign against the undersigned -- which has escalated to criminal accusations related to the intervenor-applicant's career and technical profession. In sum, the Def has created a smear franchise of at least twice-weekly (Wednesday and Friday) podcasts which exclusively focus on the undersigned and his purported, illegal activity, incompetence, aiding and abetting murder-for-hire networks, etc. All backed up with "research".
2. The seminal event in this saga was the infamous Port of Charleston (South Carolina) "dirty bomb hoax" on June 14, 2017. This "dirty bomb hoax" led to the closure of the Waldo Marine Terminal for over eight (8) hours while several federal, state and local response agencies conducted a Type-III radiological response (equivalent to a jetliner crash) to the event. This closure was accomplished using the resources and podcasts of the Def's social media footprint (YouTube, Facebook, Twitter, etc.) known as "CrowdSource The Truth" (CSTT)[trademarked]. News media reports at the time included reports in the New York Times and CNN, etc. The following morning after the incident the U.S. Coast Guard publicly announced it had turned over any investigation of the event to the Federal Bureau of Investigation (F.B.I.).
3. Three (3) interconnected individuals were responsible for this closure. The Def, the intervenor-applicant's brother (George Webb Sweigert [George Webb]) and a CSTT side-kick of the Def called Rock Hudson, aka Deep Uranium. All three participated in a podcast live stream with an audience of ore than 2,000 (in a "live" environment). George Webb completed more



than 75 podcast shows with the Def in 2017 and “Rock Hudson” more than 30 CSTT podcast shows with the Def.

4. A few days after the “dirty bomb hoax” the undersigned published a whitepaper about the event from the perspective of Critical Infrastructure Protection (CIP), the career field practiced by the undersigned. See: *Port of Charleston evacuation case study: The cognitive threat of conspiracy theorists*, published June 18, 2017, viewed over 2,800 times at Internet URL: <https://www.slideshare.net/dgsweigert/port-of-charleston-evacuation-case-study-the-cognitive-threat-of-conspiracy-theorists> ).

5. One year ago, the undersigned published a technical report about the dirty bomb hoax entitled, Report: *The Port of Charleston Dirty Bomb Hoax and Social Media Liability* (Paperback) – April 14, 2018, Internet URL: [https://www.amazon.com/Report-Charleston-Dirty-Social-Liability/dp/1717056792/ref=sr\\_1\\_2?qid=1554482212&refinements=p\\_27%3ADave+Sweigert&s=books&sr=1-2&text=Dave+Sweigert](https://www.amazon.com/Report-Charleston-Dirty-Social-Liability/dp/1717056792/ref=sr_1_2?qid=1554482212&refinements=p_27%3ADave+Sweigert&s=books&sr=1-2&text=Dave+Sweigert) ). The undersigned made it publicly known that he would be sending dozens of copies of these technical reports to committees of Congress and law enforcement agencies to authorize and initiate an official in-depth investigation of the Port of Charleston dirty bomb hoax. Such an investigation would include a thorough review of the activities of the Def, Rock Hudson/Deep Uranium and George Webb (Sweigert). The revelations of the reports mailed to Members of Congress angered the Def (April 2018).

6. Shortly thereafter in violation of 18 U.S.C. § 1505 (Obstruction of proceedings before departments, agencies, and committees) the Def began an aggressive social media smear campaign against the undersigned. The undersigned then filed several declarations with this

Court to deny the Def's public allegations (docket numbers [ECF.nos]: 51, 54, 55, 56, 58, 59 & 60 [incorporated as if fully restated herein]).

7. On the anniversary of the Port of Charleston dirty bomb hoax the undersigned filed a federal lawsuit in the U.S.D.C. for the District South Carolina (Charleston), **2:18-cv-01633**, June 14, 2018. The allegations in the South Carolina lawsuit focused on issues related to the Racketeer Influenced and Corrupt Organizations (RICO) Act. On September 21, 2018, by ORDER of U.S.D.C. Judge Richard Mark Gergel (Charleston), then transferred the case to the U.S.D.C. for the S.D.N.Y.; where the case was assigned case no. **1:18-cv-08653**, and assigned to Judge Valerie E. Caproni (herein the S.D.N.Y. lawsuit). No activity has occurred on the S.D.N.Y. lawsuit since January 23, 2019 when the undersigned submitted his final answer to an ORDER TO SHOW CAUSE, issued November 16, 2018.

8. The conduct of the Def complained of herein in this instant pleading has occurred AFTER the submission of the undersigned's final answer to the SHOW CAUSE ORDER in the S.D.N.Y. lawsuit, January 23, 2019. There has been no activity in the S.D.N.Y. lawsuit since then. This pleading should be considered a new and independent action, **post** S.D.N.Y. lawsuit.

#### **GENERAL ALLEGATIONS**

9. **Parallel Litigation and/or Re-Litigation.** This present attempt to intervene is not an attempt to re-litigate any issues associated with the S.D.N.Y. lawsuit. In fact, great care has been taken to address issues that have occurred since the filing of the S.D.N.Y. SHOW CAUSE ORDER of 11/16/2018. The events described below do not parallel allegations or events described in the S.D.N.Y. lawsuit.

10. **Background.** As a leading *alt-right* media star and all-purpose public figure, Def operates CSTT on several social media platforms (aka *footprint*). CSTT properties that comprise the CSTT social media footprint include the following:

- YouTube.com channel entitled “Jason Goodman”.  
<https://www.youtube.com/channel/UC8Cl9QaRtuW9CNjP7pP4BBQ>
- YouTube.com channel entitled “Crowdsource the Truth 2”.  
[https://www.youtube.com/channel/UC6e48gru\\_N9w-tyqMcrI9Qw](https://www.youtube.com/channel/UC6e48gru_N9w-tyqMcrI9Qw)
- YouTube.com channel entitled “21c3D” [21<sup>st</sup> Century 3D]  
<https://www.youtube.com/user/21c3D>
- Twitter.com channel entitled “csthetruth”  
<https://twitter.com/csthetruth>
- Patreon.com channel entitled “crowdsourcethetruth”  
<https://www.patreon.com/crowdsourcethetruth>
- Facebook.com channel entitled “Crowdsource The Truth”. [Public Group]  
<https://www.facebook.com/groups/crowdsourcethetruth/>
- Facebook.com channel entitled “Crowdsource-The-Truth”  
<https://www.facebook.com/Crowdsource-The-Truth-1331354320209243/>
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<https://www.instagram.com/crowdsourcethetruth/>
- Redbubble.com channel entitled “crowdsource-the-truth”  
<https://www.redbubble.com/shop/crowdsource+the+truth>
- Subscribestar.com channel entitled “crowdsourcethetruth”  
<https://www.subscribestar.com/crowdsourcethetruth>



- Twitch.tv channel entitled “crowdsourcethetruth”

<https://www.twitch.tv/videos/170314609>

11. CSTT claims to be a fact-checking news service; but, operates akin to a methodology used in nation state cyber conflict known as “Information Operations [Info Ops]” to destroy political enemies (war propaganda). See the CSTT Patreon.Com home page; quoted in relevant part:

Crowdsource The Truth is an Open Source **Fact Checking "Truth Engine"** and political social media movement. [emphasis added] (Internet URL:

<https://www.patreon.com/crowdsourcethetruth> ). See **Exhibit One-A**. [emphasis added]

12. The Def’s proficiency at sowing deceptive falsehoods, mixed with a few grains of truth, into CSTT *news* podcasts accomplishes the Info Ops objectives of disempowerment, disruption, degrading and de-personage of a target (like the undersigned). Innocent parties (collateral damage) become CSTT on-line punching bags to increase Def’s personal profits while he recklessly deflects blame, ownership and responsibility of his acts onto these innocents (see Def’s allegations that the undersigned planned the Port of Charleston dirty bomb hoax closure – which was supervised by the Def on June 14, 2017 via CSTT podcasts).

13. For more information on the dirty bomb hoax port closure see *Report: The Port of Charleston Dirty Bomb Hoax and Social Media Liability* , Amazon Paperback – April 14, 2018; quoted in relevant part (book description on Amazon):

The only report that has ever been written about the Port of Charleston, S.C. Dirty Bomb Hoax of June 14, 2017. This booklet describes how social media hoax news sites can attack America's critical infrastructure. Seemingly, these deception merchants operate with no threat of legal action. This fertile environment has

allowed the consequence-free attacks on maritime ports, generation of hysteria of supposed assassination plots, and generate fear over unsafe consumer products.

The next generation of cyber attack tools will be based upon Artificial Intelligence and can execute complex social media attacks. Law enforcement is falling further behind the tip of the spear in comprehending the cyber warfare nature of these attack techniques. See **Exhibit One-B**.

14. The Def's CSTT enterprise purportedly collects between \$10K and \$15K monthly from over 1,111 dubious paying "patrons" (via the Patreon.Com wire transfer network) transmitted over the wires via the global payment system. Donations and contributions to the Def via CSTT are to ostensibly fund CSTT sham *investigation reports on podcasts* – which can be categorically characterized as false news, distortions of reality, deceptive and often resembling hoaxes such as screaming "fire" in a crowded theater (dirty bomb hoax). Quoting the Patreon.com web-site in relevant part:

Note: *We bill your patrons on the 1st of each month at midnight in the pacific time zone– payments process throughout the day on the 1st of each month PST. Processing payments in bulk helps keep processing fees lower.*

([https://support.patreon.com/hc/en-us/articles/](https://support.patreon.com/hc/en-us/articles/209777053-When-will-my-patrons-be-billed-)

209777053-When-will-my-patrons-be-billed- )

15. Def (and a newly identified co-conspirator [David Charlres Hawkins]) broadcast deceptive and defamatory podcasts to injure the perceived enemies of the Def's CSTT enterprise. This includes Def's perverted insinuations that the undersigned is (1) hacks police networks to enable murders of prostitutes (Vancouver, Canada "Pickton Pig Farm murders" 1996-2004), (2) aiding and abetting the murder of Capt. Gerald DeConto, USN, (3) stalking CSTT reporters with



death squads (Roswell, New Mexico), (4) acting as a planner of the Port hoax and (5) operating as a drug smuggler in Latin America in the 1980s (CIA Iran-Contra), etc. Def insists that these slurs are based on the *evidence* that *resulted* from CSTT sham *investigations*. This explains why it is, and was, so damaging and dangerous, when Def defames and incites on-line calls to violence and intimidation directed at CSTT targets (like the undersigned). Caveat: for more information on the corporate status of CSTT and Def's **Multimedia System Design, Inc.** see [ECF.no. 54] (the "CSTT" phrase is trademarked by **MSDI** and records the Def's address as listed in the court docket).

16. **Defendant's incitement of violence against undersigned.** The Def has broadcast CSTT *investigation results* to accuse the undersigned of aiding and abetting the murder of prostitutes in British Columbia, Canada and Capt. Gerald DeConto, USN. These deceptive and vile accusations were, and are, passed off as the *results of investigative research*, an attempt at inciting a digital lynch mob to harm the undersigned. The vile nature of these accusation (based on presumed research) are designed to incite CSTT viewers to cause physical violence to the undersigned. The term "incitement" as used here relies on the following definition.

"[I]ncitement creates a risk that third parties will inflict violence on the victim, whereas threats engender fear and intimidation that usually reach the victim directly." *United States v. Turner*, 720 F.3d 411 (2d Cir. 2013). [emphasis added] "It rarely has been suggested that the constitution freedom for speech ... extends immunity to speech or writing used as an integral part of conduct in violation of a valid ... statute." *United States v. Rowlee II*, 899 F.2d 1275, 1278 (2d Cir. 1990).

17. Defaming and inciting violence against the undersigned was not done in the public's interest. In fact, **none** of Def's infringing content posted since **1/1/2019** (post S.D.N.Y. lawsuit) has been removed and remains available to the public worldwide.

18. One associate of the Def is a source of great concern to the undersigned: Michael Barden of Avondale, AZ. Barden is awaiting sentencing in the Arizona state courts for aggregated assault with a firearm (Maricopa County Court, AZ). Barden has been recorded as a CSTT sidekick while he co-hosted many social media podcasts with the Def. Barden operates an independent YouTube channel (Michael Barden Targeted Individual) and other social media channels.

19. The Def spent several days at Barden's home in January 2019 and accompanied him to his state court sentencing hearing (postponed). Immediately following the latest hearing at the Maricopa County Courthouse Def released several videos accusing the undersigned of mail fraud, criminal interference, etc. In these video podcasts the Def pinned the responsibility of Barden's legal troubles onto the undersigned. This situation has culminated in Barden filing fictitious police reports with the Avondale Police Department that the undersigned has been "stalking" him. Such fraudulent "stalking" accusations are the hallmark of the CSTT smear campaigns. The Court will note that the Def is fond of complaining about his own "stalking" stories (see [ECF.no.78]).

#### **ADDITIONAL PARTY**

20. Paragraphs 1 thru 19 are hereby cited as if fully restated and realleged.

21. Intervenor-applicant MOVES that **DAVID CHARLES HAWKINS** [herein Hawkins] of Cloverdale, British Columbia, Canada be added as a proper defendant that has inflicted damaging civil torts in cooperation, coordination, agreement and in continuity with the Def. In



fact, both the Def and Hawkins have become inextricably intertwined via their social media platforms that continuously promote one another's Internet podcasts and web sites. Both have openly stated they communicate with each other several times a week.

22. Hawkins has a decade log history of an association with a former airline pilot known as Field McConnel of Plum City, Wisconsin. The pair (McConnel/Hawkins) dispensed conspiracy theories related to the World Trade Center tragedy via a consortium called "ABEL DANGER". According to one **Abel Danger** site:

**Abel Danger (AD)** started as a two man team back in 2006. That was when aviation pilot whistleblower Field McConnell contacted David Hawkins, a Cambridge graduate and global forensics economist. Over a decade later our duo team has grown into a large, globally based network of average people who have joined us to listen, share and partake in our C2CSI (**Cloud Centric Crime Scene Investigations**).

As a result of over 11 years of research, we now plan to ask Congress to authorize the President of the United States to issue letters of marque and reprisal. These letters would allow an Abel Danger Marine Expeditionary Unit of about 100 hand-picked veteran Marines to seize, subdue and take any assets, in the custody of **Serco's** private equity groups (privateers) or its shareholders or its investment banker N M Rothschild, which have been registered at the U.S. Patent and Trademark Office and are believed to have been used by **Serco's** patentee SWAT teams, possibly including blackmailed Marines from the DOD Mentor Protégé program; the Marine Corps Intelligence Activity or the Defense Attaché System, to kill named targets or groups identified from the locations attacked and the dates when they died per below or to remove protection from targets, or to remove evidence from crime scene or to sabotage investigations:



See **Exhibit One-C**. [emphasis added]

23. Hawkins has a long history of defrauding the public with claims that he is a “forensic economist” and is “Cambridge educated”. Using the title of “Cambridge educated forensic economist”, Hawkins claims to have scientific research processes and patentable novel approaches to solve “cold cases” and other “unsolved crimes”. He then uses these junk science processes to accuse the undersigned of horrible crimes.

24. On 2/27/2019 on the Jason Goodman channel video entitled: *Does Sweigert's Social Engineering Spin the Bit Spread Spy in the Padlocked Bag with David Hawkins*, (herein the 2/27/2019 video) Mr. Hawkins states, [34:37] “Let me give these people a warning. My ambition as a forensic economist, perhaps the first forensic economist to pursue this rather interesting rife on the second law of thermodynamics...”. [emphasis added] (See Internet URL: [https://www.youtube.com/watch?v=yx\\_6sj33FDs&t=2165s](https://www.youtube.com/watch?v=yx_6sj33FDs&t=2165s) ). **Exhibit One-D**. [although one channel is mentioned here, the video production is disseminated throughout the CSTT footprint].

25. Via his numerous podcasts, distributed in a widely pervasive manner daily, Hawkins claims to have scientific data and scientific “results” that offers conclusive proof that certain parties are guilty of horrific crimes. Hawkins offers a jumble of irrelevancies to the CSTT audience that orbit around the decades old **Abel Danger** conspiracy theories. This is done to confuse the general public with junk science to enrage CSTT viewers and incite violence against the undersigned.

26. One of Hawkins favorite targets is the unfortunate retired Senior Executive Service (SES) federal employee named **Kristine Marcy** (sister of Abel Danger co-founder Field McConnell). The continuous savage attacks on Marcy by Hawkins and the Def are stunning. Def and Hawkins link Marcy to a Virginia-based corporation known as SERCO. SERCO, allegedly,

works with Marcy to operate a snuff film industry by employing “snuff teams” to kill children, etc. Variations of these allegations have resided in the dark corners of the Internet for over a decade, on odd-ball blogs and bizarre web-sites. Now, Hawkins and Def have brought these narratives into the full light of contemporary social media platforms (CSTT footprint) and have linked the undersigned with the same activities for which they have accused **Marcy**. See comments of Hawkins on the CSTT video entitled,

*“Is Ethical Hacker Sweigert a Weatherman and Cornfield Cruiser Abuser? with David Hawkins”*, distributed April 3, 2019, at time mark 7:11, Internet URL:

<https://www.youtube.com/watch?v=mx-YkocUD88> ). The two obviously enjoy (as judged by giggles, smirks and snickers in video productions) accusing Marcy of:

- Creating the Department of Justice (DoJ) PRIDE LGBTQ organization so that lesbians could infiltrate key positions within the U.S. Marshals Service (USMS).
- Creating the database of the National Center for Missing and Exploited Children (NCMEC) to locate desirable human sacrifices for government elites.
- Creating “CON AIR”, aka Joint Prisoner and Alien Transport System (JPATS) for the purpose of deploying convicts in “CONAIR SWAT TEAMS” to kill high value targets (as in child snuff films).
- Arranging for U.S. Small Business Administration mentor-protégé firms to act in concert with SERCO, INC. to abduct and kidnap small children for compromise operations and eventual death in snuff films. (See Public Law 100-656).

27. In summary, Goodman/Hawkins believe (and widely broadcast thru their podcasts) that Marcy is a lesbian that created the DoJ PRIDE organization to enable lesbians to infiltrate the USMS for the purposes of kidnapping desirable children to be sold into human trafficking, or to



star in “kiddie snuff films”. Hawkins has been spewing nonsense of this ilk for over a decade, he has now joined forces with Goodman to attack and destroy the undersigned with these narratives. Or, as Hawkins has stated, “**to fold Sweigert into**” this vile and despicable slanderous story-line.

28. Hawkins has implicated several innocent institutions within the jurisdiction of this Court in his “kiddie snuff film” narrative. Both Goodman/Hawkins have openly mocked the Intervenor-Applicant for writing to SERCO, INC., 12930 Worldgate Drive, Suite 600, Herndon, Virginia 20170. In such letters the undersigned has advised SERCO that there are continuous broadcasts by Goodman/Hawkins (on the CSTT footprint) that have claimed that SERCO was the prime facilitator of this snuff film network. SERCO is regularly targeted as an on-line punching bag for the Def’s CSTT podcasts (see snuff films, CON AIR SWAT teams, etc.).

29. As a minor issue and point of clarification, in the 2/27/2019 video; Hawkins states, “[time-mark 36:35] Now Sweigert [undersigned], **the clown**, writes to SERCO, International, or incorporated, in Washington or Virginia saying that you and I – Jason – are engaged in tortious interference of the shareholders of SERCO, Inc. “. It is hereby affirmed that no such language is contained in the letter in question, dated 2/20/2019 which is displayed during the show in video content. There was no such reference to tortious interference in said letter. However, Hawkins makes this statement to make the undersigned appear inept and wrong. (See Internet URL: [https://www.youtube.com/watch?v=yx\\_6sj33FDs&t=2165s](https://www.youtube.com/watch?v=yx_6sj33FDs&t=2165s) ). [Although one channel is mentioned here, the video production is disseminated throughout the CSTT footprint].

30. As the Court will learn, SERCO has continuously been accused by Goodman/Hawkins (via the CSTT footprint) of working with DoJ PRIDE LGTBQ operatives to access the database of the National Center for Missing and Exploited Children (NCMEC) to locate desirable children that could be kidnapped and snuffed. SERCO has been accused of designing and operating a

“murder-for-hire” network that is somehow interfaced to the U.S. federal government’s “Federal Bridge” (aka federal PKI bridge), which is a digital certificate certification authority that facilitates electronic commerce in a secure manner. These are not isolated videos, and now the undersigned has been “folded in” to the story.

31. Kristine Marcy is also accused by the Def and Hawkins of working with DoJ PRIDE lesbians and members of NCMEC to create a “snuff catalogue” that would allow “high end elites” to watch child snuff films via high-speed networking and visual labs. Another on-line punching bag for Goodman/Hawkins is the high-speed networking research funded by the National Science Foundation (NSF), 2415 Eisenhower Blvd, Alexandria, VA 22314. See NSF Instrumentation Award No. EIA-9871058, “Electronic Visualization Laboratory” (EVL), University of Illinois at Chicago (UIC). According to the daily Goodman/Hawkins drum-beat, the UIC EVL is used to facilitate “dead-pool” betting on the exact time of death of a victim featured in a live high-bandwidth visual “pay-for-view type” of event. See **Exhibit Five [Exh.5]**

32. The foregoing describes how Goodman/Hawkins act with callous and reckless disregard of the facts against at least three institutions that find their headquarters in this jurisdiction.

33. As **Exhibit Two [Exh.2]** clearly indicates, Hawkins is ramping up a smear campaign against the intervenor-applicant that will rival the Hawkins “Kristine Marcy” defamation and harassment campaign (see SERCO, CON AIR, snuff films, NCMEC, federal bridge, etc.). In essence, the undersigned is “fresh meat” for Hawkins and the Def. Def needed a fresh disgusting narrative to groom his CSTT audience that the undersigned is a disgusting sub-human that needs to be eliminated. Hawkins provided this to the Def with the decade old Kristine Marcy narrative. The Marcy smear campaign provides a clear indication as to the pattern and practice of the



inextricably intertwined duo of Hawkins and Goodman. In sum, the undersigned has become the new “Kristine Marcy” for this pair. See **Exhibit Five [Exh.5]**

34. This “new and improved” Info Ops smear campaign has specifically targeted the status of the intervenor-applicants as a **Certified Ethical Hacker**, which is an Information Technology credential recognized by the U.S. Department of Defense pursuant to DoD Directive 8570. See Appendix 3 to the DoD 8570.01-Manual, “Auditor”, “Incident Responder”, “Infrastructure Support” and “Analyst”. As explained in the *Cybersecurity Reference & Resource Guide [2013]*, U.S. Department of Defense, Chief Information Officer, *International Cybersecurity Program*; quoted in relevant part:

“Certified Ethical Hacker

A Certified Ethical hacker is a skilled professional who understands and knows how to look for weaknesses and vulnerabilities in target systems and uses the same knowledge and tools as a malicious hacker, but in a lawful and legitimate manner to assess the security posture of a target system(s). The CEH credential certifies individuals in the specific network security discipline of Ethical Hacking from a vendor-neutral perspective.” [Page 22] ( <https://www.hsd1.org/?view&did=735671> )

35. Hawkins distributes (under the watchful eye of Goodman) statements such as these on his Patreon.Com web-page (continuously promoted by the Def):

- a. “Serco Group’s apparent frauds on the Five Eyes countries’ patent offices, the Simulation and Hacking Information Technology (S.H.I.T.) **secretly embedded by Dave G. Sweigert** into existing EVL CAVE environments and Entrust federal bridge networks. **[Exh.2]**



- b. My research indicates that Sweigert (email [Spoliation-notice@mailbox.com](mailto:Spoliation-notice@mailbox.com)!) **left a backdoor** in Northwestern University's EVL IT Partnerships [Exh.2]
- c. Teachers through patented high-speed bit-spread backdoors **apparently left by Dave Sweigert in the EVL IT networks which** allegedly allowed BBC [Exh.2]
- d. truth test the alibis of the **Rogue Teachers on 9/11 and possible hacks by Dave G. Sweigert** [Exh.2]
- e. Who, apparently used an ethical (?) hack of the EVL BAT CAVE by **David G. Sweigert**, former consultant to U.S. Army Simulation, Training and Instrumentation Command (STRICOM) in Orlando, Florida, for **"Con Air Serco's Catalogue Killing\*"** of Bartels and his Cantor Fitzgerald colleagues on 9/11. [Exh.2]" [See **Exhibit Two**] [emphasis added]

36. This smear campaign death march, which destroyed the personage of Kristine Marcy, is now aimed to destroy the personage of the intervenor-applicant. It is the objective of this latest reputation destruction campaign to inflict economic injury and ruin the professional reputation of the undersigned as a highly skilled member of this nation's cyber defense forces.

37. By relying on monikers such as "Cambridge educated forensic economist". Hawkins deceives the public that he has attained a professional designation that is related to the presentation of evidence within a framework of rules relied upon by the courts. This fraudulent presentation ("Cambridge educated forensic economist") fortifies the junk science research presented by the duo to target individuals for reputation destruction with "evidence".

38. Hawkins has clearly stated what – he himself – believes is the purpose of a "forensic economist". **"Forensic economics is about people who want to bring the ground truth of the crime scene – or fraud scene – into court ..."**. See video on the Jason Goodman YouTube channel, entitled *"Can Simulation Hacking IT Guru Sweigert Explain BAE's Bit Spread 9/11?"*

*With David Hawkins.*” ”, release 3/1/2019, at tie-mark 12:47. Internet URL:

<https://www.youtube.com/watch?v=7J2IhYrT4PQ&t=12s> [Contained within **Exhibit Three**].

Also in **Exhibit Three** undersigned is pictured in a yoga legs-crossed position and shown in the Islamic garb of a Hamas terrorist. [Although one channel is mentioned here, the video production is disseminated throughout the CSTT footprint].

### INTERVENOR-APPLICANT

39. As the Court is aware, the undersigned filed several “DECLARATIONS” between May and June 2017 in this Court. (ECF nos: 51, 54, 55, 56, 58, 59 & 60 [incorporated as if fully restated herein]).

40. **Background.** The undersigned commenced unrelated litigation in this district in 1994 to obtain relevant documents from the Central Intelligence Agency. See *Sweigert v. CIA*, 1:94-cv-01585, Date Filed: 12/02/1994. This lawsuit is related to an issue concerning a foundational *qui tam* case pursuant to the federal False Claims Act (31 U.S.C. § 3730) in which the undersigned was a relator. Related case: *U.S.A. ex. rel. SWEIGERT v. ELECTRONIC SYSTEMS ASSOCIATES*, 85 F.3d 630 (No. 95-3884) (6th Cir. 1996). Quoted in relevant part: “Sweigert's complaint was filed as a *qui tam* action under the False Claims Act. 31 U.S.C. §§ 3730-3733.” (See Internet URL: <https://law.justia.com/cases/federal/appellate-courts/F3/85/630/490180/> ).

41. The undersigned’s father is inventor of the cordless telephone, which has been cited by Hawkins in his murder conspiracy theories. See: Wikipedia entry, quoted in relevant part:

**George H. Sweigert** (1920–1999) is widely credited as the first inventor to hold a patent for the invention of the cordless telephone.

The US Patent and Trademark Office issued US Patent 3,449,750 to Sweigert on June 10, 1969. The New York Times reported the award of the patent in the June 14th, 1969



edition. (page 52, column 6) In the article, [father of undersigned] Sweigert gives the first known printed description of how the "remote phone" might be used as a remote office or around the home, foreshadowing the way cell phones are used today. A friend told Sweigert that the article appeared in the Times, but Sweigert did not believe it completely until he received official word from the US Patent and Trademark Office later that week. Sweigert held two amateur radio licenses: W8ZIS (Ohio) and N9LC (Indiana). He was an amateur extra radio operator, the highest class of amateur radio. He also held a First Class Radiotelephone Operator's Permit issued by the Federal Communications Commission. (See Internet URL: [https://en.wikipedia.org/wiki/George\\_Sweigert](https://en.wikipedia.org/wiki/George_Sweigert) ).

42. The undersigned followed his father's footsteps and became an enlisted member of the U.S. Air Force with a specialized career field of Ground Radio Communications Equipment Repairman from 1979 to 1983. He was honorably discharged and was able to obtain two master's degrees (Project Management [1992] and Information Security [2004]). It is instructive to note that the undersigned is Certified in Homeland Security, Level – III by a professional governance body (see [pg.24of25,ECF.no.58]). This is one example of a dozen other professional industry certifications achieved during a lifetime of service to the U.S. Government as a defense-aerospace consultant.

43. The undersigned is also a former member of the American Bar Association (ABA) Information Security Committee (ISC) and was a technical contributor to the "PKI Assessment Guidelines" (PAG). As the Court will learn, the undersigned is ridiculed, mocked, and singled out for retribution and targeting by Goodman/Hawkins for such activities as his participation in ABA ISC PAG (federal PKI bridge and murder-for-hire network). [See Publication: PAG v 1.0,

May 10, 2003, ABA ISCJ. Example schematic diagrams of the federal bridge are contained in

**Exhibit Four.**

44. Goodman/Hawkins have distributed several social media video productions accusing the undersigned of using his knowledge of Public Key Infrastructure (PKI) to arrange for the death of New York fire fighters, U.S. military personnel, and other innocents using his “hacking” skills to breach network security. The narrative that the federal PKI bridge is a “murder for hire” network has long been pushed by the **Abel Danger** crowd. Hawkins/Goodman “struck gold” when they learned the undersigned had consulted to the U.S. National Security Agency on issues related to the federal bridge (1998-2000).

45. A general narrative for many of the Hawkins/Goodman malicious attacks on the undersigned can be catalogued as in the variety of “the Federal Bridge” or “the Federal PKI Bridge”, or “the Federal Certification Authority Bridge”. The Federal Bridge is a root certificate authority (digital certifications aka International Telecommunications Union (ITU) standard 509.v3) that enables cross-domain electronic commerce between the federal and state governments and large federal contractors. The Federal Bridge is held up by Goodman/Hawkins as the “murder for hire” network that enables the kidnapping, torture and murder of children in snuff films. See **Exhibit Four**.

46. It is instructive to note this description of the U.S. Government’s Federal Bridge:

**Federal Public Key Infrastructure Management Authority (FPKIMA)**

Governed under the Federal PKI Policy Authority (FPKIPA) and managed by GSA, the Federal Public Key Infrastructure Management Authority (FPKIMA) provides trust infrastructure services to federal agencies.



**Federal Bridge CA (FBCA)** is the PKI Bridge that enables interoperability between and among federally operated and business partner PKIs.

(<https://www.idmanagement.gov/topics/fpkima/>)

47. The undersigned can confidently assert that after listening to dozens of hours of video content that feature both the Def and Hawkins, that both operate from a position of complete ignorance, or in complete reckless disregard of the truth, regarding their joint podcasts that describe the Federal Bridge as the “murder for hire” network used to transmit orders to execute children in pedophile snuff films (to include the facilitation of hacking into the cockpit of a Boeing 737 aircraft). The continuous distribution of this Goodman/Hawkins junk science *research* fuels the narrative that the Federal Bridge is the favorite tool of lesbian child abductors operating within the USMS. **[Exhibit Two]**. Another spin by Goodman/Hawkins is that the undersigned has performed illegal acts in the performance of his duties related to participation in ABA ISC PAG type of activities.

48. In previous employment, the undersigned was an associate and consultant to the Center for Forensic Economic Studies (CFES), Eighth Floor, 1608 Walnut St., Philadelphia, PA 19103 in 2003 (<https://cfes.com/>). This CFES engagement was directed at building up an electronic evidence and Electronic Stored Information (ESI) [see Fed. R. Civ. Proc. Rule 34] practice for CFES.

49. In his role at CFES, the undersigned worked elbow-to-elbow with real bona fide forensic economists – a title which David Hawkins claims for himself. Again, the undersigned can confidently state that Goodman/Hawkins operate from a position of complete ignorance, or reckless disregard of the truth, in the arena of forensic economic theory -- which is a litigation tool. The following text from the CFES web-site is instructive on this point:



**THE CENTER FOR FORENSIC ECONOMIC STUDIES** is a leading provider of expert economic analysis and testimony. Our economists and statisticians consult on matters arising in litigation, with a focus on the analysis of economic loss and expert witness testimony on damages.

We assist with discovery, uncover key data, critique opposing claims and produce clear, credible reports and expert testimony. Attorneys and their clients have relied on our expertise in thousands of cases in jurisdictions across the country.

Contact the Center for Forensic Economic Studies to discuss how we can assist you in the preparation and presentation of your damages case.

(<https://cfes.com/>)

50. Hawkins is simply a fraud who has pinned the title of “Cambridge educated forensic economist” to his junk science research for the purposes of deceiving members of the public with his deceptive video podcast content. The misconduct of Hawkins is ratified, affirmed and approved of by the Def. The purpose of this fraudulent and deceptive tactic (forensic economist label) is to fortify the sham hoax junk science-based allegations pushed by Hawkins/Goodman.

51. Although Goodman/Hawkins understand that their fraudulent podcasts are false and misleading, the two continually push these deceptive narratives to terrorize audience members that the U.S. Government can easily kidnap their children using the Federal Bridge (and we all have the undersigned to blame). The purpose of this Goodman/Hawkins scheme is to collect contributions, donations and patrons on the PATREON.COM wire transfer network (see [ECF.no.55]) and simultaneously destroy the undersigned.

### **SPECIFIC ALLEGATIONS**

#### **COUNT ONE: VIOLATION OF 42 U.S.C. § 1985 FOR RETALIATION**

52. Paragraphs 1 thru 51 are hereby cited as if fully restated and realleged.

53. This Court is in the strongest position to evaluate the actions of the Def regarding violations of the anti-conspiracy sections of 42 U.S.C. § 1985(2) (*Obstructing justice; intimidating party, witness, or juror*) and § 1985(3) (*Depriving persons of rights or privileges*) concerning retaliatory conduct directed at a witness of this instant lawsuit.

54. Def Goodman and Hawkins willfully with malicious intent entered into a civil conspiracy for the purposes of generally destroying the personage and professional technical career of the undersigned by using the tactics of defamation *per se*, insulting words like “clown” (in violation of Virginia Code Ann. § 8.01-45), business conspiracy (in violation of Virginia Code Ann. §§ 18.2-499 and 18.2-500), common law conspiracy, intentional infliction of emotional distress, personal trespass by computer (in violation of Virginia Code Ann. § 18.2-152.7) and computer harassment (in violation of Virginia Code Ann. § 18.2-152.7:1) [herein damages to the undersigned].

55. Damages to the undersigned have, and are presently, being accomplished via the use of Def’s willful and malicious slanderous accusations, defaming characterizations of the undersigned’s career and technical abilities, invasion of the undersigned’s privacy, and the use of junk science “research” disseminated on the CSTT footprint via podcasts by a so-called “Cambridge educated forensic economist” [Hawkins]. In addition to Def’s slanderous, defaming and insulting words, Hawkins claims to have “research results” that would implicate the undersigned in a variety of crimes that would impugn the undersigned’s professional certification as a **Certified Ethical Hacker (CEH)**. Caveat: DoD Directive 8570, Appendix 3. Since at least 1/1/2019 these podcasts were and are conducted each Wednesday and Friday for one hour



during. Examples of Hawkins defamatory and trade libel statements are included in **Exhibit Three**.

56. In violation of Virginia Code Ann. § 18.2-499 (*Combinations to injure others in their reputation, trade, business or profession; rights of employees*) Goodman/Hawkins willfully broadcast attacks in a malicious manner to damage the undersigned's professional qualifications, and business reputation for the undersigned's participation in this lawsuit. The Def's primary and overriding purpose was and is to injure the undersigned in reputation, trade, and business (legal malice) which is motivated by hatred, spite and ill-will. In carrying out this conspiracy the Def and Hawkins (others include Joe Napoli of San Diego, California and Michael Barden) acted intentionally, purposely, and without legal justification to impact the business and property interests of the undersigned.

57. It is alleged that after the undersigned filed documents and declarations in this Court (ECF nos: 51, 54, 55, 56, 58, 59 & 60 [incorporated as if fully restated herein]), and that said filings and witness participation caused the Def to use his CSTT social media footprint to intimidate, humiliate, threaten and cause the undersigned to live in fear and concern over loss of business relationships, reputational damage and destructions of his Internet personage. This was undertaken by the Def to have the undersigned withdraw from legal proceedings – especially this instant lawsuit. Note: in *Crump v. Commonwealth*, 84 Va. 927, 6 S.E. 620 (1888), the court stated that “[a] conspiracy or combination to injure a person in his trade or occupation is indictable.” *Id.* at 934, 6 S.E. at 624; see also *Harris v. Commonwealth*, 113 Va. 746, 749, 73 S.E. 561, 562 (1912) (stating that “a conspiracy must be a combination of two or more persons, by some concerted action, to accomplish some criminal or unlawful purpose, or to accomplish some purpose not in itself criminal or unlawful, by criminal or unlawful means”).



58. Def willfully retaliated against the undersigned with his personal public calls to violence (in violation of Virginia Code Ann. § 8.01-45), slander, impugning undersigned's career and character and the use of co-conspirator Hawkins to broadcast defaming trade libel, which was widely distributed, to slander, defame and invade the privacy of the undersigned.

59. The Def's attacks on a witness [undersigned] to this instant lawsuit is an attack on the very integrity of this Court. Several circuits have found that the main purpose of 42 U.S.C. § 1985(2) is to protect the integrity of the court itself. *Rutledge v. Arizona Bd. Of Regents*, 660 F.2d 1345, 1354-55 (9<sup>th</sup> Cir. 1981); *McCord v. Nailey*, 636 F.2 606, 617 (D.C. Cir. 1980) *cert. denied*. The *Rutledge* court reasoned that there was a congressional desire to protect the integrity of the federal judiciary. 636 F.2d at 615.

60. The extent of the malevolent content created by the Def for the CSTT footprint is clearly depicted in the attached **Exhibit Five** which is a simple search of "JASON GOODMAN SWEIGERT" on the YouTube.Com platform [YouTube is offered only as an example, as such search results could be conducted on all footprint social media platforms (Twitter, Patreon, etc.)]. The YouTube search results show more than a dozen (+12) video productions, distributed in a widely pervasive manner, to an audience of thousands worldwide. The content of these podcasts is designed to injure, damage, and create loss to the liberty interests in a professional technical reputation by the undersigned.

61. For at least the past four (4) months, Def has widely disseminated the fraudulent narrative that there is a "Campaign" directed at the Def (see generally ECF. no. 78) and that the undersigned is the leader. The opposite is true. The idea of this "Campaign" has been denied by many of the individuals accused by Def in ECF. No. 78 (these individuals are now listed as interested parties to this litigation. Although the Court has elected to strike several declaration

from non-parties (see pg.7,ECF 85), the undersigned references their statements as indicators of similar persons situated for illustrative purposes (see Jacquelyn Weaver, Dean Fougere [Titus Frost], Steven Outtrim and Kevin Marsden).

62. ***Demonstrating the Actual Malice of the Def.*** It is instructive to demonstrate the actual malice of the Def as he inaugurated this long-standing smear campaign. The following examples speak to the Def's personal animus to attack and injure the undersigned for mailing technical reports to Members of Congress. The following demonstrates that the Def's is motivated by hatred, spite and ill-will (to be addressed in **COUNT FIVE**).

63. On May 4, 2018, Def accused the undersigned of planning the Port of Charleston (South Carolina) dirty bomb hoax of June 14, 2017. "I believe they are working together. And I believe that they planned that incident in the Port of Charleston – for a number of reasons."

[pg.6of12,ECF.51-1].

64. On May 4, 2018, Def stated "I am extrapolating that his [undersigned] interactions with the CIA and the Sandinistas could indicate involvement in a criminal operation of Iran-Contra." [pg.6of12,ECF.51-1]. Def is referring to the 48 hours of captivity the undersigned endured in Nicaragua when a peace keeping helicopter (in which he was a passenger) was forced to execute an emergency landing in Managua in 1981. (Described [pg.1of5,ECF.51]).

65. On May 4, 2018, Def stated "We are going to start to assemble the evidence we have. Evidence that is going to link Dave [undersigned], and George [Webb Sweigert], and Robert David Steele, and Manual Chavez [YouTube name "DEFANGO"] ...". Essentially, the same list as "co-conspirators" described in Def's ECF. no. 78. [pg.6of12,ECF.51-1].



66. On May 4, 2018, Def stated “I really do hope that Dave [undersigned] brings this to some federal body that has jurisdiction over criminal prosecution in this matter. Because I will see to it that man be put into jail.”. [pg.7of12,ECF.51-1].

67. On May 4, 2018, Def stated “if he wasn’t the worm that he is – the waist of oxygen – the disgusting human being – whose own father knew that the proper place for him [undersigned] was to sleep on newspaper with dog shit.” [pg.7o12,ECF.51-1]. These excerpts are from a video podcast featuring Joe Napoli of San Diego, California. See “The Trolls of Mount Shasta”. (<https://www.youtube.com/watch?v=qyg9YejHy0k>).

68. It was in this environment of constant public attack (see above) that caused the undersigned to file the declarations with this Court (ECF nos: 51, 54, 55, 56, 58, 59 & 60). Unfortunately, the filing of these declarations only enraged the Def more, which led to a measurable increase in the intensity of the smear campaign. Following the filing of the undersigned’s declarations the Def published more CSTT footprint podcasts with defaming, slanderous insulting words to injure the career and profession of the undersigned.

69. For these acts, the undersigned seeks to recover costs, expenses, out-of-pocket expenses and costs other losses in an amount to be determined by the Jury, but not less than \$1,000,000.00 (one million dollars).

**COUNT TWO: VIOLATION OF 42 U.S.C. § 1985 FOR CONSPIRACY**

70. Paragraphs 1 thru 69 are hereby cited as if fully restated and realleged.

71. In violation of Virginia Code Ann. § 18.2-499, (*Combinations to injure others in their reputation, trade, business or profession; rights of employees*) it is hereby alleged that Def Goodman and Hawkins are inextricably intertwined as they willfully entered into a civil conspiracy to exact retaliation and retribution against the undersigned for his appearances as a



witness in this instant lawsuit. An artifice of the civil conspiracy is the dissemination of fraudulent and deceptive claims concerning the undersigned, accompanied with allegations of his criminal activity for the purpose of inuring his reputation, business and/or profession that both support in a social media “echo chamber”. That the dissemination of such CSTT podcast content was undertaken in a willful and malicious manner to directly injure, harm and damage the undersigned’s technical career in the arena of ethical hacking (a legitimate DoD recognized occupation; DoD Directive 8570, Appendix 3. See “Certified Ethical Hacker”).

72. The objectives of the civil conspiracy are to damage, injure, and ruin the technical career of the undersigned. Carefully crafted wording is injected into podcasts to include: illegal, hacking, man-in-the-middle attack, back-door, knowledge of networks, etc. to insinuate that the undersigned was involved in illegal hacking activity, incompetence, misconduct, etc. Such acts of trade libel and defamation by insinuation orbit around the undersigned’s professional career and livelihood.

73. For example, in the 2/27/2019 CSTT video content Def states, [39:40] “This is how you [Hawkins] and I are earning a living right now, and if Mr. Sweigert doesn’t approve of that, well he is certainly welcomed to present factual evidence; but, what he is doing is making up nonsense and conspiring with others around the Internet to break the law, to engage in civil torts, and generally just be a trouble-maker.” (See Internet URL:

[https://www.youtube.com/watch?v=yx\\_6sj33FDs&t=2165s](https://www.youtube.com/watch?v=yx_6sj33FDs&t=2165s) ). **Exhibit One-B** [Although one channel is mentioned here, the video production is disseminated throughout the CSTT footprint].

74. Further, in the same 2/27/2019 video, Mr. Hawkins states “[41:00] Where I believe StarNet Communications was using this “bit-spreading” technology to transfer snuff films ... [then undersigned’s book “Ethical hacker’s Field Operations Guide” is displayed in video]

[41:45] I am starting to think the kit they took away reeked of some amateurish network sniffer [Goodman laughs] who may have found an opportunity to hack into the police network – the Vancouver Police network or the RCMP – and allow the people who were going out to the “Pig Farm” to the Friday night raves, i.e. seventeen [17] hundred to two [2] thousand people coming from all over North America including your country. [43:46] I suggest that you [Sweigert] hacked into it, and you’re so incompetent you [Sweigert] left a backdoor that other people, organized crime networks, actually got in and were able to move killers from the United States – possible by CON AIR – out to the “Pig Farm” to stage cannibal feasts and serial killing and on-line betting on the length [of time] it would take for people to die.” (See Internet URL: [https://www.youtube.com/watch?v=yx\\_6sj33FDs&t=2165s](https://www.youtube.com/watch?v=yx_6sj33FDs&t=2165s) ). **Exhibit One-B.** [Although one channel is mentioned here, the video production is disseminated throughout the CSTT footprint].

75. Goodman and Hawkins entered into this conspiracy to destroy the career and reputation of the undersigned sometime in October - December 2018 time frame to knowingly use podcast smear campaigns, trade libel, defamation, threats, reputation destruction and corrupt persuasion to engage in the distribution of false and misleading podcast content directed toward the undersigned with the intent to influence, hinder, delay or prevent the testimony of the undersigned in this official proceeding.

76. This does not mean that other co-conspirators were not involved in the overall scheme to include: Joe Napoli of San Diego, California and Michael Barden of Avondale, Arizona.

77. For these acts, the undersigned seeks to recover costs, expenses, out-of-pocket expenses and costs other losses in an amount to be determined by the Jury, but not less than \$1,000,000.00 (one million dollars).

### **COUNT THREE: CIVIL CONTEMPT**



78. Paragraphs 1 thru 77 are hereby cited as if fully restated and realleged.

79. Def simply does not respect this, or any other, federal court. The Court should be warned. Def has released more than **57** video podcasts that include some reference to a “fake lawsuit” brought by Robert David Steele (plaintiff). Def also invites litigation while playing a stalking victim. As noted in [pg.1 of 22, ECF.no.59] SIXTH DECLARATION of the undersigned the Def has invited this litigation on the part of the undersigned; GOODMAN: “Why don’t you release whatever evidence it is you think you have. **And you can intervene in the lawsuit.** We all know it is a **fake lawsuit.**” [emphasis added]

80. Such cavalier remarks are an insult to the integrity of the U.S. federal court system. Not only has Goodman (and his sidekick Hawkins) continually attacked a federal witness to this federal proceeding, the Def openly mocks the court and its decisions. Such behavior smacks of civil contempt of this Court. This creates a shadow of doubt as to Def’s true motives, which appear to be rooted in bad faith and failure to comply with normative rules, laws and customs associated with the litigation process. A definition of civil contempt is provided in the DOJ Criminal Resource Manual; quoted in relevant part:

#### 752. GENERAL DEFINITION OF CONTEMPT

Contempt of court is an act of disobedience or disrespect towards the judicial branch of the government, or an interference with its orderly process. It is an offense against a court of justice or a person to whom the judicial functions of the sovereignty have been delegated.

The power of a federal court to punish a contempt of its authority is limited by Title 18, United States Code, Section 401 to:



"(1) Misbehavior of any person in its presence or so near thereto as to obstruct the administration of justice; (2) Misbehavior of any of its officers in their official transactions; (3) Disobedience or resistance to its lawful writ, process, order, rule, decree, or command."

[JM 9-39.000]

By contrast, civil contempt sanctions--which are designed to compel future compliance with a court order--are coercive and avoidable through obedience, and "thus may be imposed in an ordinary civil proceeding upon notice and an opportunity to be heard. Neither a jury trial nor proof beyond a reasonable doubt is required." *International Union, UMW v. Bagwell*, 512 U.S. 821, 114 S.Ct. 2552, 2557 (1994).

[JM 9-39.000]

81. In *Griffin v. County School Board*, 363 F.2d 206 (4<sup>th</sup> Cir. 1966), the court cited "In effect it was a "resistance to its (this court's) lawful writ, process, order, rule, decree or command." It is the active resistance and open defiance to the litigation process which casts the shadow of civil contempt over the CSTT operation.

82. Many federal courts do not require a violation of a specific mandate to engage the court's inherent powers to mitigate civil contempt. In sum, many federal courts have resorted to a basic line of reasoning: (1) broad construction of the terms on the contempt statute, (2) interpretation of a legal action as an implied order, (3) inapplicability of the statute as a limitation on the power of the courts.

83. In the case of witness intimidation, retribution and retaliation (as practiced by the Def) it is instructive to consider the case of *United States v. Zavelo*, 177 Fed. 536 (C.C.N.D. Ala. 1910).

The court held that witnesses were immune from the service of process while attending trial.

The purpose of this immunity, or privilege, is to insure the attendance of witnesses. [*Civil*

*Contempt in Federal Courts*, 24 Wash. & Lee L. Rev. 119 (1967).

(<https://scholarlycommons.law.wlu.edu/wlulr/vol24/iss1/12>)].

84. In this context the Court should consider that 18 U.S.C. Section 1512(b)(1) makes it a crime to (1) knowingly (2) use intimidation, threats or corrupt persuasion or engage in misleading conduct toward another (3) with the intent to influence, delay or prevent the (4) testimony of that person in an official proceeding.

85. The actions of the Def to continuously attack, defame, intimidate and threaten participants in this instant lawsuit is reprehensible and is undertaken in open defiance to the integrity of this Court. This Court has inherent powers to force acceptable conduct by the Def.

86. For these acts, the undersigned seeks to recover costs, expenses, out-of-pocket expenses and costs other losses in an amount to be determined by the Jury, but not less than \$1,000,000.00 (one million dollars).

#### **COUNT FOUR: DEFAMATION PER SE**

87. Paragraphs 1 thru 86 are hereby cited as if fully restated and realleged.

88. Both Def and Hawkins willfully and maliciously caused the (1) publication of (2) an actionable statement which (3) demonstrated the two were at fault for such publication (via the CSTT footprint podcasts). The intent of such statements was to ruin the undersigned's reputation and cause others not to associate with him. These statements, widely disseminated by both the Def and Hawkins, were designed to:



- Attribute to the undersigned his involvement in criminal, and/or unethical behavior as part of his professional responsibilities, and
- Attribute to the undersigned that he is unfit to perform his technical duties and part of his professional trade.

89. For example, in the CSTT video production entitled, “*Did SERCO's Patented EVL Bat CAVE Entrust Pentagon Attack Simulation to Sweigert?*”, published on 2/6/2019 on the CSTT2 YouTube channel (although one channel is mentioned here, the video production is disseminated throughout the CSTT footprint), Mr. Hawkins states, “[8:50] We need to find out where David Sweigert was on 9/11 [September 11, 2001], and you told me he was in the Air Force, is that correct? [Goodman responds] Well I know that he is an Air Force veteran, I don’t know when he served, for a time he was rambling on about being captured by the Sandinistas, and then when I said my only knowledge of the U.S. military being involved with the Sandinistas was during Iran-Contra. And I asked him if he was a cocaine dealer for the C.I.A. like Barry Seale [?] and he got all upset and said that I accused him of that. I am just asking him more questions about his resume.” **Exhibit Six-A.**

90. The Court’s attention is directed to ECF no. 51, a document in which the undersigned clearly explained his role in Latin America as an active duty member of the military. A copy was served upon the Def May 16, 2018 [speaks to actual malice].

91. As an aside, Hawkins also states (in the same video) “[17:11] Kristine Marcy launches a database for the National Center for Missing and Exploited Children under the custody, or in the custody, the office of justice programs. Which also does prisoner tracking. ... [17:51] And she has access to a database of missing an exploited children which of course in the wrong hands can



become a catalogue – that is to say if you want a six year-old girl at your disposal on Christmas Day 1996 go to the Boulder home of Jon Benet [Ramsey] ” **Exhibit Six-A.**

92. Goodman continues, “[23:18] Mr. Sweigert agrees in a phone call to be compensated financially for harassing me and Crowdsorce the Truth through a letter writing campaign and an on-line harassment campaign that involves a cyber militia that he has put together. Mr. Simpson [aka Frank Bacon ?] seems to have a lot of faith in these ridiculous lawsuits that Mr. Sweigert is bringing about .. but, these guys are going to be taught a lesson by the U.S. justice system.”

**Exhibit Six-A.**

93. Hawkins continues, “[25:30] Let me talk about the legal remedies we are talking about. It seems that Sweigert defines me as your side-kick that we might be tortuously interfering with the business of the shareholders of SERCO, Inc. And as I have pointed out, SERCO, Inc. doesn’t have any shareholders.” **Exhibit Six-A.** For the record the undersigned has never made such claims, ever.

94. Hawkins continues, “[42:07] Sweigert claims to be an expert in radios, I presume he is an expert in radio patents. ... [43:15] These people who are snipping at you [Goodman] like Sweigert and some of the people at Abel Danger who appear to be snipping at you to get at me. Or, they are too scared to take me on. They are at severe risk because if we bring a lawsuit for wrongful death we get discovery. ... [46:29] So, Mr. Sweigert should understand, that what we’re unleashing here is no malice, there is no criminality on our part, I believe that the victims or the families of the victims that died in the U.S. Navy Command Center have an excellent case to bring a class action lawsuit against the custodians of the patented devices that were used to kill their loved ones in the Pentagon U.S. Navy Command Center. ... [47:01] So, who were the

custodians of what on 9/11 that caused those wrongful deaths. Well, it is either **SERCO** or **RCA.**” **Exhibit Six-A**

95. Goodman continues, “[57:48] We did not know that David Sweigert was an expert in simulations, a consultant to Booz\*Allen & Hamilton that is advertising, even today, on their web-page, that they are doing these simulated war-games. Could he be the person who was overseeing these – was it his Entrust certification – was he entrusted with creating these simulations David, do we know?” Goodman is referring to the former employment of the undersigned with Entrust Technologies, which was a U.S. Government contractor that enabled the federal PKI bridge.

96. Hawkins continues, “[58:50] If for example David Sweigert knew how to sabotage Motorola encryption devices such that those fire fighters didn’t get the order to evacuate [on 9/11] then **I would say we should actually fold him in with the ad hoc or de facto custodians of the patented devices that were responsible for the wrongful death of 343 fire fighters.**” [emphasis added]

97. Goodman then displays a letter, sent by the undersigned (dated 1/29/2019) addressed to Motorola Solutions, concerning the claims of Goodman/Hawkins. The letter from the undersigned informed Motorola that the duo had been distributing slanderous and defaming comments about that institution. See **Exhibit Six-A**.

98. Hawkins then comments on the letter, “[59:35] Because he [Sweigert] is not the sharpest knife in the drawer. What he has done, if I may say so. He [Sweigert] has drawn my attention to his role in all of this. ...” **Exhibit Six-A**

99. Goodman then comments, “[1:00:12] Well, we have got someone [in the chat room] saying that of course he [Sweigert] had nothing to do, this is someone in the chat. “Technical



Perfection” says ‘of course he had nothing to do with 9/11. They [Goodman/Hawkins] are just doing this because he [Sweigert] trigged them’. That’s not true. I think the actions Mr. Sweigert has been taking are way over the top and indicate a possible deeper involvement here.” **Exhibit Six-A.**

100. The foregoing indicates the pattern and practice used by the Def and Hawkins to spread several defaming and slanderous remarks over the course of a one-hour podcast show (widely distributed on the CSTT footprint).

101. To clearly understand the continuous nature of these torts the Court should consider the following excerpts from the PATREON.COM page of Mr. Hawkins. Incidentally, the Hawkins Patreon page is continuously promoted in each CSTT podcast that features Hawkins (at least 4-5 times). For example [**Exhibit Seven**]:

- Serco Group’s apparent frauds on the Five Eyes countries’ patent offices, the Simulation and Hacking Information Technology (S.H.I.T.) **secretly embedded by Dave G. Sweigert** into existing EVL CAVE environments and Entrust federal bridge networks, and the wrongful deaths on 9/11 of the late director of the current operations and plans branch of the Navy Command Center,
- [M]ore importantly, truth test the alibis of the Elite Teachers on 9/11 and **possible hacks by Dave G. Sweigert who appears to have allowed a BBC-scripted simulated continuity-of-government exercise to be switched to a live-fire attack over the federal bridge**
- [G]roups of Teachers through patented high-speed bit-spread backdoors **apparently left by Dave Sweigert in the EVL IT networks which** allegedly allowed BBC scriptwriters access to the ITT/STC technologies needed to stage the *first live broadcast mass snuff*



*film in human history* in Zulu time on 9/11 and synchronize an exercise with the times and place of actual explosions of the London Underground bombs on 7/7/2005. **My research indicates that Sweigert may unwittingly have left a backdoor** in Northwestern University's EVL IT Partnerships

- My research indicates that the hot-spot demolitions of WTC7 (no plane!) are the same as WTC 1 & 2 but the destruction of the U.S. SS files in **WTC7 (N.B. Sweigert's email is Spoliation-notice@mailbox.com!)** suggests that **Sweigert may have helped rogue Teachers conceal 9/11 co-conspirators** in Northwestern University's EVL IT Partnerships to include Singapore (Serco's Standard Chartered Bank shareholder on same floor as the Secret Service!), State of Illinois, Chicago, China, Russia, Motorola, Nortel and BBC.
- With a Reverse CSI Scripts licence agreement, the "Teachers" could use A.I. deductive logic and in-house EVL virtual reality theatre to protect their funds and, more importantly, truth test the alibis of the **Rogue Teachers on 9/11 and possible hacks by Dave G. Sweigert** who appears to have allowed a BBC-scripted simulated
- **The research indicates that Sweigert may have left a backdoor** in to conceal a cat-bond fraud on the Teachers' funds and bit-spreading evidence linking 9/11 to Singapore—Serco shareholder investor in Standard Chartered Bank on 10th floor of WTC7 with U.S. Secret Service—State of Illinois, Chicago, China, Russia (New Rodina?), Motorola, Nortel and the BBC.

102. To amplify the above, the Court's attention is directed to the video production entitled, "*Was Sweigert the EVL BAT CAVE Custodian or Key Holder for BAE Bit-Spread Pentagon Bomb*, 2/13/2019, Internet URL:

[https://www.youtube.com/watch?list=PLBISynguD0vavfCdMPho3-](https://www.youtube.com/watch?list=PLBISynguD0vavfCdMPho3-a83kqgIq4L1&v=3_HUTQvwsg4)

[a83kqgIq4L1&v=3\\_HUTQvwsg4](https://www.youtube.com/watch?list=PLBISynguD0vavfCdMPho3-a83kqgIq4L1&v=3_HUTQvwsg4), **Exhibit Six-B**. [Although one channel is mentioned here, the video production is disseminated throughout the CSTT footprint].

103. The Def states, “[14:00] And of course we know that he [undersigned] worked for Entrust and is an expert in Public Key Infrastructure, which – that is what the federal bridge is all about. It is a public private key infrastructure. [show federal bridge diagram – **Exhibit Six-B**].”

104. The Def continues, “[15:22] Let’s presume for a moment David [Hawkins] that Mr. Sweigert is an ethical hacker - he has told us that. [NOTE: this claim is denied by the undersigned as he has never “told” the speakers about this credential]. I didn’t know that, he [undersigned] wrote a book about ethical hacking. And, furthermore, what if he [undersigned] is put there as an ethical hacker to do something ethical and then unbeknownst to him, once he has unlocked the door, someone else who might be unethical takes advantage of that and comes right in there. He could tell us. I don’t know who hacked the federal bridge and who manipulated the Boeing uninterruptable auto-pilot and who may have taken these aircraft off of their en-route airways, **but, he certainly hacked it.** ”

105. Hawkins replied, “[16:11] You are absolutely right. The man [undersigned] appears to be **arrogant and stupid**. [Goodman laughs]. But, very clever in his particular box of expertise. That is to say, he has written a book about ethical hacker [sic], I read it and I barely understand it. [17:10] He [undersigned] has to answer I believe now our questions.” [book is shown in video, see **Exhibit Six-B**] [Note: arrogant and stupid speaks to insulting words]

106. Hawkins continues, “[18:30] So, I think it is well within the bounds of possibility that after Dave Sweigert left the key in the door, [photograph of undersigned displayed in janitor uniform at the Pentagon] or allowed some people to get in, a snuff film, or snuff film team, or a



snuff team went into the Pentagon upgrade project at the U.S. Navy Command Center and put a couple of bullets from a Glock [handgun] into the back of the head of Captain Gerald DeConto. [Goodman: “wow”].” [Exhibit Six-B]

107. Not only have the pair accused the undersigned of aiding and abetting murder (via snuff teams and not the 9/11 jetliner crash into the Pentagon), the Def and Hawkins are attempting to tie the federal PKI bridge to the possibility that a hacker could penetrate the cockpit of a Boeing aircraft and therefore cause the plane to crash. This hacking penetration of the cockpit flight control via the federal PKI bridge is thus impugned onto the undersigned.

108. It is instructive to note the following post on the web-site “PentagonMemorial.Org”; quoted in relevant part:

**CAPT Gerald F. DeConto, USN**

As director of the current operations and plans branch of the Navy Command Center, CAPT Gerald F. DeConto, 44, was organizing the Navy’s response to the World Trade Center attack when he died in the crash at the Pentagon.

( <https://pentagonmemorial.org/explore/biographies/capt-gerald-f-deconto-usn> )

109. It is alleged that the foregoing video production [Exhibit Six-B] represents a pre-rehearsed and scripted interview to include agreed upon key points, such as the allegation that the undersigned aided and abetted the murder Capt. Gerald DeConto at the Pentagon on 9/11 via “snuff teams”. It is alleged that the direct accusation (rising above mere insinuation) by Hawkins implicates the undersigned in the murder of Capt. DeConto (via snuff team).

110. Hawkins has been using the name and legacy of Capt. DeConto since at least 2010 in his sham investigations and fake news research reports. The Court’s attention is directed to the web-site “911disclosure-blogspot.com” quoted in relevant part:



**Sunday, March 14, 2010**

**Strong-Power TOPOFF from JFK to 9/11**

Claim Maurice Strong restructured Power Corp. of Canada to murder top officials ("TOPOFF"), including

JFK in 1963 and US Naval Command Center duty officer on 9/11.

To: Members of **Hawks CAFE** <http://groups.yahoo.com/group/hawkscafe/>

From: Captain Field McConnell and **David Hawkins, Forensic Economists at Hawks' CAFE** <http://www.hawkscafe.com/>

We claim that globalist and then president Maurice Strong restructured Power Corporation of Canada in 1963 to support the destruction of the sovereign state using hired assassins to murder top officials ("TOPOFF"), including U.S. president John F. Kennedy in 1963 and the Pentagon's **US Naval Command Center duty officer, Captain Gerald DeConto, on 9/11.**

Our research into Strong-Power's alleged private-equity assassination teams, indicates that extorted, corrupted or deceived members are paid in cash (Tongsun Park, Maurice Strong, Brian Mulroney) or negotiable instruments of value, such as heroin (Cotroni-Bonanno-Rizutto crime families), **snuff films** (Vivendi, Radio Canada, Current TV) or carbon credits (Chicago Climate Exchange, Generation Investment).

111. "Hawks CAFÉ" is the sham research organization that was organized and promoted by Hawkins in Vancouver, British Columbia. More sham hoax conspiracy theories developed by Hawkins that orbit around Capt. DeConto.

Monday, March 8, 2010

McConnell, Hawkins Describe 9/11 Murder of Burlingame, DeConto

Synopsis: Describes 9/11 murders of captains Charles Burlingame and Gerald DeConto using decoy and drone maneuvers and jets with embedded GyroChips (military gyroscope).

McConnell, Hawkins Describe 9/11 Murder of Burlingame, DeConto

[http://www.cooperativeresearch.org/timeline.jsp?timeline=complete\\_911\\_timeline&day\\_of\\_9/11=aa77](http://www.cooperativeresearch.org/timeline.jsp?timeline=complete_911_timeline&day_of_9/11=aa77)

Copyright: Captain Field McConell and **David Hawkins**

<http://groups.yahoo.com/group/hawksafe/>

We describe below the alleged sequence of events which resulted in the murders of Captain Charles Burlingame and **Captain Gerald DeConto** on September 11, 2001.

We will now proceed against them and get Justice for Captain Charles Burlingame and Captain Gerald DeConto and the thousands of their fellow innocents murdered on 9/11.

Field McConnell

28 year airline employee

22 year military pilot

23,000+ hours of safety

**David Hawkins**

Notes: "McConnell, Hawkins Describe 9/11 Murder of Burlingame, DeConto"



( <http://911disclosure.blogspot.com/2010/03/mcconnell-hawkins-describe-911-murder.html> ) [emphasis added]

112. The Court should note that the SES career employee known as Kristine Marcy is Field McConnell's sister and the two are involved in a probate estate dispute over their parent's farm in Wisconsin (Plum City, Wisconsin). It is not specifically germane to this instant legal action; but, it is alleged that McConnell initiated the smear campaign with Hawkins against his sister Marcy to drive her to suicide so that McConnell could inherit the family farm by the possible elimination of Marcy. [See **Exhibit Eight**]

113. Another example of the sham investigations and hoax news of Hawkins is contained on his Patreaon.Com page, entitled, "*Endowment Invitation—Serco North Tower Teachers' Cat Bond Fraud—Sweigert's EVL Con Air BBC Hack—Clinton Zulu Alibi Plate: David C. Hawkins Discovery CSI™* ", 2/21/2019 at 5:07 pm. [See **Exhibit Six-C**]. This Patreon.Com page is quoted in relevant part:

With a Reverse CSI Scripts licence agreement, the "Teachers" could use A.I. deductive logic and in-house virtual reality theatre to protect their funds and, more importantly, expose the secret society of world bankers and intellectual elites hinted at in the late President John F. Kennedy's speech; a society which, I believe, **hired Dave G. Sweigert** and various Con Air SWAT teams **to hack the Entrust federal bridge** and link the University of Illinois EVL BAT CAVE to Northwestern University's IT Partnerships, including the BBC, so Bill Clinton's scriptwriters in Australia could attribute the 9/11 attacks to bin Laden groups. [emphasis added]

114. The distribution of slander, trade libel and defaming statement by Hawkins is not limited to just YouTube and Patreon channels; but, includes Twitter.Com as well. [Exhibit Six-C].

115. The above statements are merely a representative example of the hundreds of statements willfully made by Hawkins to malicious injure the undersigned's reputation and status as a Certified Ethical Hacker, which speaks directly to reputational damage and trade libel.

116. For these acts, the undersigned seeks to recover costs, expenses, out-of-pocket expenses and costs other losses in an amount to be determined by the Jury, but not less than \$1,000,000.00 (one million dollars).

### **COUNT FIVE: BUSINESS CONSPIRACY**

117. Paragraphs 1 thru 116 are hereby cited as if fully restated and realleged.

118. In violation of Virginia Code Ann. § 18.2-499, *Combinations to injure others in their reputation, trade, business or profession; rights of employees, and common law*, both Def and Hawkins (along with others such as Joe Napoli of San Diego and Michael Barden) have conspired together to damage, injure and harm the business reputation of the undersigned. The undersigned seeks relief pursuant to Virginia Code Ann. § 18.2-500.

119. The Court is advised that the trademark "Crowdsource The Truth" is a business trademark. It was issued to "Multimedia System Design, Inc." (MSDI). The U.S. Patent and Trademark Office (USPTO) contains the following entry:

<b>Word Mark</b>	<b>CROWDSOURCE THE TRUTH</b>
<b>Goods and Services</b>	IC 041. US 100 101 107. G & S: Providing on-line videos featuring news in the nature of current event reporting, not downloadable. FIRST USE: 20161001. FIRST USE IN COMMERCE: 20170801
<b>Standard Characters Claimed</b>	
<b>Mark Drawing Code</b>	(4) STANDARD CHARACTER MARK
<b>Serial Number</b>	87752970
<b>Filing Date</b>	January 12, 2018



<b>Current Basis</b>	1A
<b>Original Filing Basis</b>	1A
<b>Published for Opposition</b>	June 5, 2018
<b>Registration Number</b>	5544901
<b>Registration Date</b>	August 21, 2018
<b>Owner</b>	(REGISTRANT) Multimedia System Design, Inc CORPORATION NEW YORK 6s 252 7th Avenue New York NEW YORK 10001
<b>Disclaimer</b>	NO CLAIM IS MADE TO THE EXCLUSIVE RIGHT TO USE "CROWDSOURCE" APART FROM THE MARK AS SHOWN
<b>Type of Mark</b>	SERVICE MARK
<b>Register</b>	PRINCIPAL
<b>Live/Dead Indicator</b>	LIVE

120. The commercial trademark (linked to the address of the Def entered into ECF) speaks to the commercial nature of the Def's malicious and willful attacks. Possible motivation could include the preservation of the public appearance of accuracy, integrity, news-reporting or research to support the CSTT "fact checking truth engine" claim. This would motivate the Def to destroy individuals like the undersigned that question the Def's conduct (legal malice).

121. It is alleged that Def and Hawkins entered into this conspiracy to create an unlawful combination to perform acts contrary to the laws of the United States and the Commonwealth of Virginia to injure, harm, and cause economic damage to the professional career of the undersigned. Both conspired to use unlawful means to accomplish this conspiracy.

122. The goals of the conspiracy were to (1) willfully and maliciously injure the undersigned in his reputation, trade, business and profession by a variety of means, and (ii) willfully and maliciously compelling others to act in further of this conspiracy (to include Joe Napoli and Michael Barden). Def has consistently attempted to procure the participation of others and CSTT audience members to join in the CSTT smear campaign against the defendant (for example, the constant re-tweeting of Def and Hawkins vile video content).

123. It is alleged that this conspiracy has forever damaged the professional reputation of the undersigned and has created a cloud of impropriety, unethical behavior and illegal misconduct around the undersigned via the podcasts and blog posts created by the Def and Hawkins that riddle the Internet.

124. The primary overriding purpose of this conspiracy is to coerce the undersigned to (1) resign, withdraw or retreat from the publication of technical white-papers and journals that discusses the Port of Charleston incident, and/or to (2) retreat, withdraw, surrender, and/or voluntarily dismiss legal actions in the face of overwhelming social media destruction of his business and trade reputation (see Certified Ethical Hacker).

125. The Def's primary and overriding purpose was and is to injure the undersigned in reputation, trade, and business (legal malice) which is motivated by hatred, spite and ill-will. In carrying out this conspiracy the Def (and Hawkins, Napoli, Barden) acted intentionally, purposely, and without legal justification to impact the business and property interests of the undersigned.

126. As an example. In the video production entitled, "*Question for Legal Experts – Has D. George Sweigert Committed Mail Fraud?*", 1/9/2019, Internet URL:

<https://www.youtube.com/watch?v=pmnscVplJNQ> [**Exhibit Six-D**], the following description is provided:

Streamed live on Jan 9, 2019

D. George Sweigert has brought a civil suit against Jason Goodman **based on fraudulent claims**. Sweigert has changed his address three times since initiating the suit. His current address, listed in public filings with the court, is a PO Box in Mesa AZ. Only problem is,



when I called them in November, the Post Office said D. George Sweigert is not the owner of that P.O. Box. What is going on in Arizona? [emphasis added]

127. On the same day another video was posted entitled, “*Michael Barden Targeted Individual – Results of Michael's Sentencing Hearing On the Courthouse Steps*”, 1/9/2019, Internet URL: <https://www.youtube.com/watch?v=obqQTt1jJYM>. [Exhibit Six-D]. The second video features a discussion between the Def and Michael Barden of Avondale, AZ. This discussion took place on the steps of the Maricopa County Court, AZ where Barden is awaiting sentencing for a charge of disorderly conduct with a firearm, case no. 13-2904A6 (F6) (Pled Guilty as Charged 10/16/2018).

128. In the video with Michael Barden (1/9/2019) Def states, “[3:42] The other thing we should bring up again Michael is that Marc J. Victor [Barden’s defense attorney] was contacted by David George Sweigert. Specifically, David George Sweigert told Marc J. Victor that you [Barden] have been making YouTube videos describing Marc J. Victor’s failure to uphold the guidelines of the Arizona State Bar. Now Mr. Sweigert – David George Sweigert – chose of his own accord, with no relationship to this case whatsoever, chose to contact Marc J. Victor in an effort to harass you Michael...[Barden “the day before I had to make that plea deal] He [undersigned] interfered with an officer of the court, he interfered to your rights to a fair trial, and I do hope that there is some repercussions for that, he should not be interfering with the normal justice process.” [Although one channel is mentioned here, the video production is disseminated throughout the CSTT footprint]. [Exhibit Six-D]

129. The Def is referring to a series of videos that CSTT broadcast known as “The Counter Lawfare Report” which featured Michael Barden (September to December, 2018). In said videos, both Def and Barden accused attorney Marc J. Victor of violating the canons of ethical



conduct as promulgated by the State bar of Arizona. The undersigned contacted Mr. Victor and advised him of the three (3) videos of Def and Barden that reached a world-wide audience in excess of 25,000.

130. It is instructive to note that the Def created a video entitled, "*Michael Barden – Targeted Individual When The Police Harass You, Who Do You Call?*", 9/13/2018, Internet URL: <https://www.youtube.com/watch?v=dy3XCyBVOj8> [Exhibit Six-D] both Def and Barden discuss the undersigned's book "*Port of Charleston Dirty Bomb Hoax and Social Media Liability*." A copy of the book is displayed in video. [Exhibit Six-D]. Therefore, **five (5) months** prior to the videos with Barden in Mesa, AZ on the courthouse steps, a video concerning the undersigned's book had already been distributed across the entire CSTT footprint. In that video, both the def and Barden accuse the undersigned of working as a government contractor to harass Barden under a dubious government program known as "gang-stalking".

131. In this video (cited above, five months prior to the courthouse steps video) the Def states, "[10:20] [undersigned's book is displayed] It is interesting to note that this individual's [undersigned] brother was the key source of information in this alleged bomb hoax. I knew nothing about it. I was deceived by these individuals. I was put under psychological stress. I was led to believe that the possible outcome of this incident in the Port of Charleston could have a more detrimental public effect than 9/11."

132. The combination of the Def and Barden to slander and defame the undersigned's book represents the early stages of inclusion of Barden into the Def's conspiracy to defame, slander, injure and damage the undersigned, by attacking his credibility and technical work product. Barden is just one example of an individual joining Def's legal malice to injure the business reputation of the undersigned.

133. To continue the goals of the conspiracy Barden released three (3) videos on his social media channel (Michael Barden – Targeted Individual) where he accused of the undersigned of “stalking”. These videos include the following [**Exhibit Six-D**]:

- *David George Sweigert reported to police by Michael Barden, 3/19/2019*

Internet URL: <https://www.youtube.com/watch?v=NmRbmYv72Ro&t=1s>

- *Michael Barden response to David Sweigert's odd behavior and harassment, 3/24/2019*

Internet URL: <https://www.youtube.com/watch?v=9oSLzLhwwdY&t=323s>

- *Stalker public notification David Sweigert in video description, 3/18/2019*

<https://www.youtube.com/watch?v=sMIhoxAL1nA&t=1823s>

134. For these acts, the undersigned seeks to recover costs, expenses, out-of-pocket expenses and costs other losses in an amount to be determined by the Jury, but not less than \$1,000,000.00 (one million dollars).

#### **COUNT SIX: INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

135. Paragraphs 1 thru 134 are hereby cited as if fully restated and realleged.

136. It is alleged that the Def conduct (statements and actions) were, and continue to be, (1) intentional, willful, malicious and reckless, (2) that Def's conduct was, and is, extreme, outrageous and intolerable, (3) that the emotional distress visited upon the undersigned is a direct result of the Def's conduct, and (4) the resulting emotional distress has been severe. *Womack v. Eldridge*, 215 Va. 338, 210 S.E.2d 145 (1974).

137. The Def used trade libel, slander, defamation by insinuation and defamation per se to cause the undersigned to believe that as he entered the crest of his career his technical reputation



would be destroyed, soiled, sullied and made ineffective by the Def, causing loss of future income and contracts by the undersigned.

138. That the undersigned's marketability in the arena of penetration testing, ethical hacking, networking security, etc. would be forever soiled, sullied, destroyed and tarnished by the literally hundreds of vile references made concerning the undersigned by the Def's baseless accusations (which entirely lack foundation) that now riddle the Internet.

139. As the foregoing information in this pleading has demonstrated, the Def's has acted in an intentional and malicious manner with conduct which is so extreme as to go beyond the bounds of decency. The Def's conduct is atrocious and utterly intolerable in a civilized society.

140. The Def's conduct has caused the undersigned to increase physical security of his temporary domicile to include installation of closed circuit television (CCTV) cameras, initiation of a 24 hour monitored burglar and home defense protection service, repairs to a motor home to allow for off-site living at various campgrounds to deter would-be stalkers, disruption to business operations caused by address changes to foil would be stalkers, physical health issues related to loss of appetite and nervous tension, acquisition of firearms for personal protection, etc.

141. All of these precautions have been required due to the direct and proximate cause of the Def and his CSTT side-kicks (Hawkins, Napoli and Barden). The undersigned has suffered emotional trauma, insult, embarrassment, humiliation, public ridicule, anguish, stress and anxiety, injury to reputation, special damages, costs and out of pocket expenses in an amount to be determined by the jury, but not less than \$1,000,000.00 (one million dollars).

**COUNT SEVEN: UNAUTHORIZED USE OF NAME AND PICTURE**

142. Paragraphs 1 thru 141 are hereby cited as if fully restated and realleged.

143. During the period described, from 1/1/2019 until the present, the Def and Hawkins have mis-used the name and portrait, photograph and/or image of the undersigned for their own profit, advertising and commercial purposes. Neither Def or Hawkins have obtained the undersigned's permission to use his name and/or image, photograph, picture or portrait.

144. The undersigned has suffered damages from the unauthorized use of his name and/or portrait, photograph, image or picture, which has included a loss of business, loss of reputation, damage to business relationships, out-of-pocket expenses and costs and other losses in an amount to be determined by the Jury, but not less than \$1,000,000.00 (one million dollars).

#### **REQUEST FOR RELIEF**

145. As the foregoing indicates, the time is ripe for this Court to curtail Def's out-of-control retaliation and vindictive attacks on the undersigned.

146. The Court should allow the undersigned to be permitted to act as a PLAINTIFF in this litigation, which will aid the administration of justice by providing the Court with a documented history of the Def's activities of industrial scale defamation, slander, trade libel and defamation by insinuation.

147. Pursuant to Virginia Code Ann. § 18.2-500 the undersigned seeks a permanent injunction against the Def and David Hawkins. Such injunctive relief should be an ORDER to direct social media platform providers to remove the accounts of the co-conspirators. For instance, the Patreon.Com account of David Hawkins and Crowdfunder the Truth should be removed in their entirety by account termination and de-platforming. All social media accounts assigned to Jason D. Goodman and David C. Hawkins should be terminated by an ORDER from this Court.

148. The Court should rely on its inherent power to ORDER the removal of all content referencing the undersigned from all social media controlled by Hawkins/Goodman. This includes



references made on Patreon.Com, YouTube.COM, Facebook.Com, Twitter.Com,

Periscope.Com, BitChute.Com, etc. The media empire of Hawkins and Goodman is extensive.

149. The Court should rely on its inherent powers and conduct a SHOW CAUSE hearing as to why the Def should not be fined and held in civil contempt for his on-going attacks (“fake lawsuit”) on the integrity of this Court. Such a Court finding should provide a history of the Def’s reprehensible conduct as a reference tool for others that have been attacked by the Def. At a minimum the Court should remain aware of the Def’s flagrant disparaging remarks about this court on his CSTT footprint (“fake lawsuit”).

150. This Court should award the undersigned \$1,000,000.00 (one million dollars) in compensatory damages and \$3,000,000.00 (three million dollars) in treble damages to demonstrate the seriousness of the Def’s conduct.

151. The court should rely on its inherent powers to hold Def accountable for obstruction of justice and witness tampering. Def’s conduct is nearly text-book obstruction of federal proceedings – judicial, congressional and executive. The Def has used deception and corruption and intimidation to prevent the production of evidence and witness harassment to prevent the production of evidence. The Def uses the CSTT social media empire to obstruct justice and intimidate witnesses with coercive tactics.

152. The court should rely on its inherent powers to find that Hawkins is an accomplice working with the Def to participate in the foregoing articulated misconduct; to include obstruction of justice and intimidation of witnesses.

153. This Court should award al other relief that it determines is due the undersigned.

**TRIAL BY JURY DEMANDED**

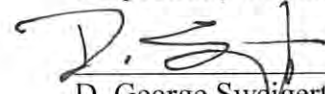
154. Trial by jury is hereby demanded.

### CONCLUSION

155. Plaintiff's pleading burden has not only met, but, has exceeded the pleadings threshold, particularly as no discovery has occurred, and he has established standing. Thereby, it would be premature to dismiss any causes of this motion.

I hereby certify that the foregoing information and attached exhibits are truthful and correct under penalties of perjury.

Respectfully submitted,

  
D. George Sweigert, *pro se*

4/9/19